

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

**MOTION TO SEAL**

The United States of America, hereby moves this Honorable Court to issue an order maintaining under seal the Government's Sentencing Memorandum and accompanying attachments. As grounds for this motion to seal, the government states that the sentencing memorandum contains the name and personal details of the victim in the instant case and other individuals associated with the defendant. The memorandum also contains attachments that relate to personal details of other individuals and their involvement with the defendant. To prevent disclosure of personal information relating to the victim and others in this case, as well as in the interest of maintaining the victim's and others' privacy, the government requests that this Honorable Court maintain the attached document under seal.

Respectfully submitted,

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United States Attorney

By: Carmen M. Ortiz  
Carmen M. Ortiz  
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Date: November 5, 2005